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Policy Gaps in Indonesia's Caregiver Training Curriculum and Their Impact on International Care Worker Mobility

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Abstract

The dynamics of labor mobility between Australia's aging elderly population and Indonesia's surplus productive workforce face a major challenge: inconsistencies in training curricula. This study aims to analysis the structural gap between the policy of the non-formal care workers training curriculum in Indonesia and the Aged Care Australia (CHC33021) qualification standards, a mismatch that positions Indonesian migrant care workers within a liminal professional space marked by uneven competency recognition. Using a comparative documentary analysis methodology, this study evaluates five main competency clusters: language proficiency, core caregiving skills, ethics and human rights, digital literacy, and work culture. Theoretically, this study integrates Turner's (1974) concepts of "liminality" and Foucault's (1995). The results showed that the 40% placement failure rate was not caused by individual incompetence, but by the absence of a Mutual Recognition Arrangement mechanism and differences in regulatory philosophy. Critical gaps include the absence of mandatory clinical practicums, non-standard English-language thresholds, and a disregard for rights-based ethics. As a solution, this study proposes a Bilateral Curriculum Alignment Framework (BCAF) to transform the migrant workforce. These findings contribute to the literature on migration-development governance and the achievement of SDGs targets through dignified labor mobility.

1 Introduction

Australia's aging demographic and Indonesia's abundant working-age workforce have created the most pronounced bilateral labor mobility dynamics in the Asia-Pacific region today. Australia's aging population is projected to exceed 20% of the total population by 2030 (Institute, 2012), meaning the demand for direct care workers will continue to grow and will be impossible to meet solely within the domestic market ([AIHW], 2023; Commission, 2022; Mavromaras et al., 2017). The Australian government projects a shortage of approximately 110,000 aged care workers by the same year, particularly in the personal care and community support segments ([AIHW], 2023; Safety, 2021). Indonesia, on the other hand, has one of the largest working-age workforces in the region, including a growing pool of nurses prepared by vocational institutions, namely the Job Training Institute and the Course and Training Institute, for the overseas job market (ILO, 2023; Wahba, 2015).

The Comprehensive Economic Partnership Agreement between the two countries provides the legal basis for managed labor mobility and also paves the institutional foundation for the larger-scale placement of Indonesian care workers in Australia ([DFAT], 2020). However, these seemingly complementary demographic and economic logics have not yet translated into effective workforce integration. Empirical evidence from the placement of Indonesian care workers in Australian aged care settings consistently documents a significant gap between pre-departure training and competency requirements in the destination country. This condition places Indonesian migrant care workers in a liminal space (Turner, 1969; van Gennep, 1960), a transitional space “in between” two distinct social, cultural, and professional systems, where they are no longer fully fit within the Indonesian framework but also not yet fully recognised as competent professional subjects in the Australian context. Within this

liminal space, migrant care workers become subjects of disciplinary governance, continuously evaluated through competency standards, certification requirements, language benchmarks, and institutional assessments that regulate their professional legitimacy, which in Foucauldian terms refer as panoptic surveillance (Foucault, 1995). They experience uncertainty surrounding their professional identity, ambiguity about work expectations, and vulnerability to institutional control mechanisms of evaluation and regulation.

Furthermore, the Ageing Australia Survey (2025) found that 66% of aged care providers struggled to meet the training needs of new migrant workers, indicating widespread structural unpreparedness, not individual deficiencies. This gap cannot be explained solely by individual worker inadequacies, but rather reflects a systemic curriculum misalignment between pre-departure training in Indonesia and regulatory requirements in Australia (Olanrewaju & Loeb, 2024). Evaluations of Indonesia's Technical and Vocational Education and Training (TVET) system and National Occupational Competency Standards (NCS) indicate that care workers' program competency standards are often adopted from international frameworks, but implementation is weak on the ground, influenced by immature policies, limited resources, inadequate inter-ministerial coordination, and low stakeholder support (Borja & Gabor, 2023). From a Foucauldian perspective, competency standards, certification, and training evaluation mechanisms can be understood as forms of disciplinary power that operate through the process of monitoring, normalizing, and regulating the bodies of migrant care workers to conform to the global competency regime.

This paper views the misalignment between Indonesian and Australian care workers' training systems as a structural policy issue. It asks two key questions: what are the structural gaps between the Indonesian non-formal care workers training framework (including the curriculum of the Indonesian National care workers Competency Standards and the competency standards of the Indonesian National care workers Competency Standards), and the Australian aged care qualification requirements (CHC33021 and the Aged Care Quality Standards and their legislative basis)? And what policy interventions are needed to minimize this gap? To answer these questions, the paper conducts a comparative analysis across five care workers' competency areas. The study also draws on Turner (1974) concept of liminality to explain how migrant care workers become positioned “in between” two training and professional systems, while Foucault (1995) concept of disciplinary power is used to analyse how competency standards, certification processes, and regulatory mechanisms continuously evaluate and regulate migrant workers. The research problem in this paper lies at the intersection of three literatures: comparative VET alignment and qualifications; international migration and labor mobility; and inclusive education and professional identity. Each offers useful analytical tools, but is insufficient in itself. The VET alignment literature (Hanley et al., 2026) provides a framework for comparing national qualification systems, but is inadequate for mapping the power asymmetries that shape cross-national curriculum alignment negotiations. The labor migration literature documents the conditions and consequences of deskilling in transitioning migrant workers, where older adult care workers are often placed in positions for which they are underqualified because their skills and experience are not recognized, ultimately risking deskilling and long-term career barriers (Karki, 2026). Meanwhile, the inclusive education literature raises

important questions about the agency and identity of migrant care workers within the regulatory environment of destination countries, but this still needs to be further developed in the context of Indonesia-Australia policy corridors.

The paper makes a twofold contribution: first, it advances the empirical literature on bilateral vocational education and training (VET) alignment through a systematic comparative analysis across five competency clusters; and second, it makes a theoretical contribution by applying Turner's (1974) concept of structural liminality and Foucault's (1995) analysis of panoptic regulatory power to illuminate the governance mechanisms that produce and perpetuate these curriculum gaps. The significance of this research extends beyond the academic debate outlined above (Walsh et al., 2007). The Indonesia-Australia aged care migration corridor is a policy system where failure has real consequences for three groups: Indonesian workers who bear the personal, financial, and professional costs of unsuccessful placements; Australian aged care recipients whose quality of care is impacted by workforce competency deficits; and aged care providers whose regulatory compliance is jeopardized by placing workers who are not yet ready for work (Missbach & Hoff, 2020). This research aims to identify the structural sources of this curricular misalignment and propose evidence-based remediation, including a bilateral curriculum alignment framework and a Mutual Recognition Arrangement (MRA).

2 Methods

1) Research Approach and Design

This study uses a qualitative approach with a systematic *comparative documentary analysis* method (Bowen, 2009). This method enables the systematic examination of policy texts, curriculum frameworks, competency standards, and regulatory documents (Bowen, 2009) to find the structural gap between the non-formal care workers training framework in Indonesia and the regulatory requirements in *Australia's aged care* sector.

2) Data Sources and Document Corpus

The analysis was conducted on the text of the regulations and the main curriculum documents that apply during the 2021–2025 period. The document includes:

a. Indonesian Context: Indonesian National Work Competency Standards (SKKNI) for Elderly Caregivers (Kepmenaker No. 28/2021); Perpres No. 8/2012 on the Indonesian National Qualifications Framework; Permenaker No. 17/2016 on the licensing and registration of Job Training Institutions (LPK); Permendikbud No. 81/2013 on the establishment of Course and Training Institutions (LKP) as non-formal education units; and the program documents of LPK and LKP providers.

b. Australian Context: *Training Package* CHC33021 (*Certificate III in Individual Support*), *Aged Care Quality Standards* (ACQS), *Aged Care Act 1997* (also the amendment 2024), and final report of *Royal Commission*

into Aged Care Quality and Safety (2021).

3) Analysis Procedures and Competency Clusters

The analysis was conducted through three stages to identify curriculum misalignment, governance failures, and regulatory mechanisms shaping migrant care workers preparedness and labour mobility. Guided by Turner's (1974) concept of structural liminality and Foucault's (1995) notion of disciplinary power, the analysis examined not only foundational aged care competency gaps but also the institutional and regulatory conditions that position migrant care workers within unequal transnational training regimes.

a. Thematic Mapping:

Competency units within Indonesia's SKKNI (Indonesian National Occupational Competency Standards) care workers framework, and the LPK (Vocational Training Institutions) or LKP (Course and Training Institutions) curricula, were systematically mapped and compared with compulsory competency units in Australia's CHC33021 qualification framework and the Aged Care Quality Standards.

b. Cluster Categorization:

Data were organized into five critical competency clusters identified in empirical literature as major areas of workforce mismatch: (1) language proficiency, (2) core caregiving skills, (3) ethics and human rights, (4) digital literacy, and (5) workplace culture readiness (Adebayo et al., 2023; Olanrewaju & Loeb, 2024; Overgaard et al., 2022).

c. Gap Analysis Matrix (*Gap Matrix*):

A comparative gap matrix was developed to classify the nature curriculum discrepancies as technical, structural, or normative. Structural gaps referred to institutional deficiencies such as the absence of mandatory practicum requirements, while normative gaps reflected differences in regulatory philosophy, professional ethics, and rights-based care paradigms. The matrix also assessed how these gaps contribute to conditions of professional liminality and institutional evaluation affecting migrant workers' employability and recognition within the Australian aged care sector.

Thus, this study uses an in-depth normative and theoretical analysis, rather than an empirical analysis. A layered theoretical framework was used to analyze the gap in the training curriculum of Indonesian migrant nurses. This analysis goes beyond comparative documents by combining Foucault's (1995) power perspective with Turner's (1974) theory of liminality to understand how curriculum policy shapes workers' agency and professional futures. We use several methods: (a) Application of taxonomy to bilateral relations, (b) Analysis of ethical dilemmas in policy recommendations, (c) Reconstruction of the paradigm of labor diplomacy. Each component can be described as follows:

3 Results

The Problem of a Definitive Framework for Cross-National Comparisons

Cross-national policy comparisons are faced from the outset with what is called the equivalence problem, namely the challenge of determining whether conceptual categories used in one national context are truly comparable with those in another, or whether superficial terminological similarities conceal substantive institutional divergences. In the context of the Indonesian–Australian comparison of VET (*Vocational Education and Training)* and aged care policies, this problem is particularly pronounced (Bray et al., 2007; Raffe, 2009; Trow, 2006). Both systems use seemingly parallel terms *vocational education and training, competency standards, qualification frameworks, training providers* yet each refers to fundamentally different institutionally, legally, and pedagogically distinct realities. Therefore, these terminological differences need to be explicitly identified and resolved before any substantive comparison can be undertaken.

This section maps the five pairs of terminologies that present the most significant definitive challenges to this comparative analysis and proposes the paper's adopted resolution for each pair. The goal is not to decide which usage is more appropriate, but rather to establish a consistent conceptual vocabulary as a basis for comparative claims. Table 1 provides a structured overview; the analytical work that follows elaborates on the most substantial differences.

Table 1
Definitive Tensions and Their Resolutions — Key Comparative Terms

Terms (Indonesia)	**Terms (Australia)**	**Definitive Tension**	**Adopted Resolution**
Job Training Institution / Course and Training Institution (non-formal vocational training institution)	TAFE (Technical and Further Education)	Job Training Institutions / Courses and Training Institutions operate outside the formal education system; TAFE (Technical and Further Education) is state-funded and officially accredited under the AQF.	Both are treated as the primary pre-employment VET delivery institutions in their respective national systems; *VET provider* is used as a superordinate comparator term.
Indonesian National Work Competency Standards	AQF (Australian Qualifications Framework) / CHC33021 Training Package	The Indonesian National Work Competency Standards are competency reference standards; CHC33021 is a prescriptive qualification with mandatory assessment and practicum requirements.	The Indonesian National Occupational Competency Standards are treated as the benchmark for Indonesian functional qualifications; CHC33021 as the enforceable qualification standard in Australia; *the national qualification framework* is used for comparative reference.
Non-formal education	Vocational Education and Training (VET)	Indonesia's non-formal education covers a broader category, including community learning; Australia's VET is a formally regulated sector	*Non-formal vocational training* is used for the Indonesian context; *VET* is specific to the regulated sector in Australia; both are distinguished from formal higher education
Care workers / Elderly nurse	Aged care workers / Personal care workers	*Care workers* cover a wider range of job roles and are not restricted by the differences in Australian award classifications.	*care workers* is used as a cross-national occupational comparator; *personal care worker* is used when referring specifically to the Australian classification.
Migrant worker protection agency	ASQA (Australian Skills Quality Authority)	Indonesian Migrant Workers Association is the placement/protection regulator; ASQA is the training quality regulator — they are not functionally equivalent.	Each institution is referred to according to its assigned function; there is no claim of functional equivalence in bilateral regulatory comparisons.

Source: Compiled from Indonesian Migrant Workers Association, Indonesian National Work Competency Standards, Permenaker No. 3/2016, Permendikbud No. 5/2016, ASQA Standards for RTOs, AQF, training.gov.au.

The table above illustrates that the fundamental difference between the Indonesian and Australian training systems lies in their institutional categories and regulatory recognition. In Australia, Vocational Education and Training (VET) is a nationally regulated formal education sector integrated into *the* Australian Qualifications Framework (AQF) (Bahri et al., 2024). The AQF (Australian Qualifications Framework) qualifications have clear legal recognition, are transferable to higher education, and are recognized by employers and professional authorities in Australia. In contrast, migrant care workers' training in Indonesia is generally provided through Vocational Training Institutions and Course and Training Institutions, which are part of the non-formal education pathway (Marmoah et al., 2021). While participants can obtain competency certification through the National Qualifications Agency, these certificates do not have formal equivalency in Australia, resulting in Indonesian care workers entering the job market without officially recognized qualification status (Rodiyah et al., 2023). This asymmetry indicates that the Indonesia-Australia misalignment is not simply a matter of curriculum content but also concerns differences in regulatory standing and institutional recognition, requiring coordination between countries to establish mutually recognized competency standards (Burnie & Ziguras, 2001).

Another important difference lies in the regulatory nature of the Indonesian National Occupational Competency Standards and the Australian qualifications system. The Indonesian National Occupational Competency Standards serve as a reference competency standard for training providers, but they do not specify learning methods, duration, or assessment mechanisms. In contrast, the Australian CHC33021 *Certificate III in Individual Support* is a prescriptive qualification that establishes mandatory competency units, minimum assessments, and 120 hours of supervised work practice, which is closely monitored by ASQA (Australian Skills Quality Authority) through audits of training providers. Therefore, while the content of the Indonesian National Occupational Competency Standards may appear to align with Australian competencies, they do not automatically produce a workforce that meets Australian regulatory requirements. This gap is exacerbated by weak inter-agency coordination in Indonesia, particularly in visa management and migrant worker protection, resulting in suboptimal protection for care workers in the field (Riyanto et al., 2024).

The policy gap refers to empirically identifiable differences in regulations, qualification standards, and curricula between the two countries. These differences then give rise to a condition of structural liminality, namely the “in-between” position experienced by Indonesian care workers because their credentials are not fully recognized in the Australian regulatory system (Öberg & Donahue, 2009; Raghuram, 2009; Xiang & Lindquist, 2014). Furthermore, this condition affects the agency and professional identity of migrant care workers, because the regulatory system not only regulates competencies but also shapes and limits their professional space. Thus, the misalignment of the curriculum cannot be understood merely as a technical problem that can be resolved through document harmonization, but rather as a structural problem that directly impacts the lives and careers of Indonesian migrant care workers (Sheehy et al., 2023).

Indonesian Policy Context

Indonesia's migrant care workers training system is governed by a multi-agency governance framework involving several institutions: the Ministry of Manpower, the Ministry of Education, and the Indonesian Migrant Workers Association, each with interrelated authorities for training, certification, and placement. Presidential Regulation No. 8/2012 establishes the Indonesian National Qualifications Framework (KKNI), the nine-level structure against which occupational qualifications are benchmarked. Institutional authority over training providers, however, is split across two ministries, Permenaker No. 17/2016 governs the licensing and registration of Job Training Institutions (LPK) under the Ministry of Manpower, while Permendikbud No. 81/2013 governs the establishment of Course and Training Institutions (LKP) as non-formal education units under the Ministry of Education. This bifurcation is itself a source of the standardisation problem, no single instrument sets curriculum requirements across both provider types. However, these regulations still provide extensive discretion to training providers, resulting in a lack of robust standardization of curriculum quality and suitability, particularly for the needs of elderly care in Australia. Indonesian Migrant Workers Association regulates placement procedures and bilateral cooperation but has not established specific curriculum standards for the *aged care sector*, creating a fundamental regulatory gap(Ramli et al., 2025).

In practice, the Indonesian National Care Workers Competency Standards, established through Ministerial Decree No. 28 of 2021, serve as a national competency benchmark for programs at Vocational Training Institutions and Course and Training Institutions, covering personal care, basic health monitoring, communication, and safe handling. However, these standards remain limited because they do not fully accommodate Australian aged care quality standards, particularly regarding digital literacy, electronic documentation, cultural competency, and inclusive practices. This situation highlights the tension between domestic labor market needs and destination country regulations, placing Indonesian care workers in a "liminal" position, caught between two disconnected certification systems (Nagandran et al., 2025).

Job Training Institutions and Course and Training Institutions, as the primary institutions for care workers' training, also face governance issues. Extensive curriculum autonomy without a centralized quality assurance system leads to substantial variation in training materials, duration, and methods across institutions. Barriers to implementing the Indonesian National Work Competency Standards, such as limited facilities, poor instructor understanding, and limited access to internships, further widen the gap in training quality. This situation is exacerbated by commercial pressures in the relationship between training institutions and placement agencies, which are often more focused on accelerating certification and placement than improving curriculum quality. The ILO (2023) has identified enhanced P3MI accountability as a priority governance reform, implicitly acknowledging that current market mechanisms are insufficient to drive quality assurance.

At the bilateral level, although Indonesia and Australia have a cooperative framework such as the IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement), there is no MRA (Mutual Recognition Arrangement) specifically regulating the recognition of care workers' qualifications. Consequently, Indonesian certification lacks formal standing within the Australian aged care system,

requiring workers to undergo reassessment upon entering the labor market. This lack of a recognition mechanism increases costs, increases uncertainty for employers, and hinders more efficient and sustainable mobility of the care workers workforce.

Australian Policy Context

Australia's aged care system is based on *the Aged Care Act 1997 (Cth)*, which regulates the funding, regulation, and quality assurance of aged care services. The reforms, as replaced by the Aged Care Act 2024, which came into effect on November 1, 2025, represent the most significant legislative change since the law was enacted. These reforms implement the recommendations of *the Royal Commission into Aged Care Quality and Safety* (2021) by introducing a rights-based approach for service recipients, strengthening provider obligations, and establishing mandatory registration and minimum qualification standards for personal care workers.

Service quality assurance is implemented through *the Aged Care Quality Standards* (ACQS), managed by the *Aged Care Quality and Safety Commission* (ACQSC). These eight quality standards cover consumer rights and choices, personal and clinical care, the service environment, human resources, and organizational governance. This framework serves as a strict oversight mechanism through audits, surveys, and the publication of provider assessments in the *Star Ratings system*. From Foucault's (1995) perspective, the ACQS (Aged Care Quality Standards) serves as a regulatory instrument that not only assesses technical compliance but also shapes provider behavior and workforce competency standards. For migrant care workers, particularly those from Indonesia, this means their competency must meet quality expectations from the outset, as any shortcomings can impact the provider's reputation and market position.

The primary qualification for Australian aged care workers is *the Certificate III in Individual Support* (CHC33021), with a further pathway, *the Certificate IV in Ageing Support* (CHC43015). Both qualifications fall within the national framework overseen by ASQA (Australian Skills Quality Authority) and are regularly updated to reflect sector needs. The latest revision incorporates competencies related to dementia care, *trauma-informed care*, and digital health literacy, areas that are still limited in Indonesian care workers' training. A key feature of CHC33021 is the mandatory minimum of 120 hours of supervised work experience in an aged care setting. This practicum not only strengthens core caregiving skills but also introduces participants to Australian work culture, documentation, and professional standards. In contrast, the Indonesian system did not have equivalent practice component in many Vocational Training Institute and Course and Training Institutions which lead as the main structural gaps in pre-departure preparation.

The direction of this reform was strongly influenced by *the Royal Commission into Aged Care Quality and Safety* (2021), which uncovered systemic failures in the Australian aged care sector and produced 148 reform recommendations. Three recommendations are particularly relevant to this analysis: mandatory minimum qualifications and workforce registration, strengthening cultural competency and cross-cultural communication, and developing digital health infrastructure and electronic care records. These

findings make it clear that care workers are required to possess not only technical competency but also cultural skills and digital literacy, which have not yet been fully integrated into Indonesia's care workers training system (Crowley & Head, 2015).

Comparative Policy Gap Analysis

The comparative analysis in this section uses a documentary analysis methodology, which systematically refers to regulatory and curriculum texts examined in Sections 3 and 4 of the Indonesian National Care Workers Competency Standards, Perpres No. 8/2012, Permenaker No. 17/2016, Permendikbud No. 81/2013, program documentation of Vocational Training Institutions/Course and Training Institutions, the CHC33021 Community Services Training Package, Aged Care Quality Standards, and the Royal Commission into Aged Care Quality and Safety Final Report (2021). The analysis is organized around five competency clusters that are the main domains in which Indonesian care workers' training is assessed against Australian regulatory requirements: (1) language proficiency; (2)core caregiving skills; (3) ethics, rights, and inclusive practices; (4) digital literacy; and (5) work readiness and workplace culture.

The selection of these five clusters was based on empirical literature on the performance of Indonesian migrant care workers in Australian settings (Adebayo et al., 2023; Olanrewaju & Loeb, 2024; Overgaard et al., 2022), which consistently identifies these domains as the primary sites of competency deficits and inadequacies reported by employers. These clusters do not encompass all competency domains relevant to aged care work, but they capture the areas with the greatest structural divergence between the two national training frameworks and therefore provide the most productive analytical basis for policy comparison (Poulos et al., 2021).

Table 2 below presents a structured overview of the comparative gap analysis across the five clusters, mapping the framework of each, characterizing the nature of each gap, and assessing its relative impact. The detailed interpretive analysis that follows the table outlines the structural, normative, and governance dimensions of each gap in turn.

Table 2
Comparative Competency Gap Matrix — Indonesian vs. Australian Aged Care Training Frameworks

Competency Cluster	Indonesian Framework (Indonesian National Work Competency Standards / Job Training Institutions – Course and Training Institutions)	Australian Framework (CHC33015 / ACQS (Aged Care Quality Standards))	The Nature of the Gap	Implication
1. Language Skills	Basic conversational English; quality varies; no standardized proficiency threshold; minimal care-specific terminology instruction	Functional professional English is required; language of care documentation; verbal communication with residents with cognitive impairment (ACQS (Aged Care Quality Standards) 2 & 3)	Qualitative & quantitative with no equivalent benchmarks; no dedicated care registers	Critical
2. Core Caregiving Skills	Basic personal hygiene, assisted mobility; limited dementia care; no mandatory practicals in a goal-equivalent environment	120 hours supervised practicum (ASQA); dementia unit; medication management protocols; pressure ulcer prevention; basic palliative care (elective CHC33015)	Structural: no practicum; no advanced clinical care module in the Indonesian National Work Competency Standards	High
3. Ethics, Rights & Inclusive Practices	General professional conduct; limited coverage of resident rights; cultural competency framed according to Indonesian norms	Statutory rights-based framework (Aged Care Act 2024); trauma-informed practice; culturally safe care; LGBTQIA+ inclusive care (Royal Commission recommendations)	Normative: rights-based paradigm does not exist; inclusive practice frameworks differ	High
4. Digital Literacy	Minimal or no coverage; no electronic care record system; no adoption of telehealth	Mandatory electronic care documentation (Support at Home 2024); digital health record interoperability; basic telehealth operations (new CHC units 2023)	Emerging structural gaps: newly mandated in Australia; completely absent from Indonesia's National Occupational Competency Standards	High

Competency Cluster	Indonesian Framework (Indonesian National Work Competency Standards / Job Training Institutions – Course and Training Institutions)	Australian Framework (CHC33015 / ACQS (Aged Care Quality Standards))	The Nature of the Gap	Implication
5. Job Readiness & Workplace Culture	Orientation to Australian workplace norms varies; workplace simulations are limited; pre-departure preparation time is compressed	Occupational health and safety culture; inter-professional communication; understanding the regulatory environment of aged care; staff-resident relational norms	Contextual: workplace cultural socialization is not in the formal curriculum.	Medium–High

Source: Compiled from Indonesian Migrant Workers Association, Indonesian National Work Competency Standards, Perpres No. 8/2012, Permenaker No. 17/2016, Permendikbud No. 81/2013, ASQA Standards for RTOs, AQF, training.gov.au.

The comparative analysis presented in Table 2 reveals systemic and multidimensional misalignments between Indonesia and Australian caregiving training frameworks across linguistic, core caregiving skills, ethics and rights-based practices, digital literacy, and workplace culture domains that underpin migrant workers' liminal positioning within transnational aged care systems. The pattern of gaps indicates a structural divergence in how caregiving competence is conceptualized, operationalized, and regulated across structural liminality and disciplinary power.

In terms of structural liminality, the Indonesian care workers are situated in a liminal position, between two disconnected certification systems, possessing national credentials but not yet fully recognised in Australia. Van Gennep (1960) conceptual liminal space as in between states in which individuals are no longer fully embedded within their original social structure yet are not fully incorporated into a new one. As indicated in Table 2, point 1, general English language skills trained in the Indonesian system are not equivalent to the Australian CHC33015 requirement, which includes formal English language assessment, such as IELTS, as well as the ability to communicate with the elderly who have cognitive impairment.

This liminal condition is further intensified by the absence of a mandatory supervised practicum in Indonesian training, compared to the Australian system, which requires a minimum of 120 hours of on-the-job training through CHC33021. Without exposure to workplace environments, regulatory expectations, and care documentation practices, Indonesian prospective migrant workers are positioned outside the experiential transition that typically facilitates incorporation. Similarly, Indonesian curriculum

that did not incorporate specific competencies required by CHC33021 such as dementia care, palliative care, and pressure ulcer prevention, reinforce a state of liminal preparation, where Indonesian prospective migrant care workers possess Indonesian certification but not embodied practice required for recognition in Australian context which later can put Indonesian care workers at risk of clinical difficulties when placed in aged care facilities (Rengen et al., 2025).

Policy Recommendations: Towards a Bilateral Curriculum Alignment Framework

The policy recommendations developed in this section are based on four governing principles derived from comparative gap analysis and theoretical considerations. First, recommendations should address structural governance conditions, not just curriculum content. The content gap is a symptom of deeper governance failures: the absence of bilateral curriculum alignment mechanisms, divergent regulatory philosophies, and misaligned commercial incentives in the Indonesian aged care training. Recommendations that address only content without reforming the governance architecture will be inadequate and unstable (Blegur et al., 2025).

Second, recommendations must be based on a recognition of the asymmetric institutional positions of the two national systems. The Australian VET framework is a centralised, standards-based regulatory system; the Indonesian Vocational Training Institute/Course and Training Institute system operates under a decentralised provider autonomy model. Bilateral alignment proposals that assume institutional equivalence, treating the Indonesian National Occupational Competency Standards as functionally equivalent to CHC33015, or Vocational Training Institute/Course and Training Institute accreditation as equivalent to ASQA registration, will result in unrealistic expectations and predictable implementation failures.

Third, recommendations should address the agency and professional identity of Indonesian care workers, not just their foundational aged care competencies. The Foucauldian analysis demonstrates that the structural production of inadequacy operates not only in curriculum content but also in the conditions under which migrant care workers can constitute themselves as professional agents within the Australian regulatory environment (Nicolini, 2012).

Fourth, recommendations must be linked to the broader sustainable development agenda. The Indonesia–Australia care migration corridor has direct relevance to SDG 1 (no poverty through sustainable skilled employment for Indonesian workers), SDG 4 (quality education through reformed VET (Vocational Educational and Training) preparation), SDG 8 (decent work and economic growth through dignified and skills-matched employment), and SDG 10 (reduced inequality through inclusive access to bilateral labor mobility for Indonesian workers from diverse socioeconomic backgrounds). Table 3 below maps each recommendation to its key SDG alignment and priority level (Short et al., 2016).

Table 3
Policy Recommendations — Summary Matrix

Recommendation	Level	Main Actor	SDG Alignment	Priority
R1: Negotiation of bilateral MRA (Mutual Recognition Arrangement) for elderly care qualifications under IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement)	Bilateral	Ministry of Manpower / DFAT (Department of Foreign Affairs and Trade) / Indonesian Migrant Workers Association	SDGs 8, 10	Critical
R2: Development of the Bilateral Curriculum Alignment Framework (BCAF) for five competency clusters	Bilateral	Ministry of Education, Culture, Research, and Technology / ASQA / UNNES–Monash Consortium	SDGs 4, 8	Critical
R3: Establishment of a mandatory language proficiency threshold (equivalent to IELTS 5.5 / OET B) for certification of Vocational Training Institutions / AU Market Course and Training Institute	Domestic (ID)	Indonesian Migrant Workers Association / Ministry of Manpower	SDGs 4, 8	High
R4: Introduction of mandatory 80 hours of supervised practicum in the curriculum of the Job Training Institute / Course and Training Institution	Domestic (ID)	Ministry of Education, Culture, Research and Technology / Job Training Institution Provider - Course and Training Institute / P3MI	SDG 4	High
R5: Integration of digital literacy modules and electronic care documentation into the revised Indonesian National care workers Work Competency Standards (cycle 2025–2026)	Domestic (ID)	Ministry of Manpower / National Professional Certification Agency,	SDGs 4, 9	High
R6: Development of rights-based curriculum units and inclusive practices aligned with the obligations of the Australian Aged Care Act 2024	Bilateral / Domestic (ID)	UNNES–Monash Consortium / ACQSC	SDG 3, 10	High
R7: Development of AI-assisted differentiated learning pathways for Indonesian care workers in bridge/orientation programs	Bilateral / Domestic	UNNES–Monash / Job Training Institution Partner	SDG 4	Currently

Recommendation	Level	Main Actor	SDG Alignment	Priority
R8: Creation of a quality incentive structure for Job Training Institutions / Course and Training Institutions that achieve bilateral curriculum alignment benchmarks	Domestic (ID)	Ministry of Education, Culture, Research and Technology / Indonesian Migrant Workers Association / P3MI	SDGs 8, 17	Currently

Source: Author's analysis. SDG alignment based on the UN Sustainable Development Goals framework (2015).

1. R1–R2: Bilateral Governance — MRA (Mutual Recognition Arrangement) and Curriculum Alignment Framework

Recommendations 1 and 2 focus on addressing the root cause of the misalignment in Indonesia-Australia care workers training, namely the lack of a bilateral governance mechanism for qualification recognition and curriculum alignment. The first recommendation proposes the establishment of *a Mutual Recognition Arrangement* (MRA) within the IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement) framework for the aged care sector. The MRA (Mutual Recognition Arrangement) aims to provide formal recognition for certification by Vocational Training Institutions/ The Indonesian Course and Training Institute, through bridging assessments, and the establishment of ongoing consultation mechanisms, ensure Indonesia can systematically adapt changes to Australian standards. The IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement) and the Indonesia-Australia vocational education partnership have already provided the institutional basis for developing such recognition; what is needed is political and technical commitment to develop a specific scheme for the aged care sector.

The second recommendation proposes the establishment of *the* Bilateral Curriculum Alignment Framework (BCAF), a joint technical framework developed through collaboration between the Ministry of Manpower, the Ministry of Education and Culture, ASQA, and bilateral academic partners such as UNNES and Monash University. The BCAF (Bilateral Curriculum Alignment Framework) is designed as a prescriptive program standard for Vocational Training Institutions (VETs). Course and Training Institutions, by establishing curriculum content, assessment standards, minimum study hours, and practicum requirements based on five identified competency clusters. Unlike the Indonesian National Work Competency Standards, which are referential in nature, the BCAF (Bilateral Curriculum Alignment Framework) will serve as a mandatory reference for training institutions seeking to produce graduates with qualifications recognised in the Australian system. It will be periodically reviewed following updates to Australian training standards.

2. R3–R5: Indonesian Domestic Reform (Standards, Practicum, and Digital Literacy)

Recommendations 3 to 5 address the domestic policy reforms Indonesia needs to improve the quality of training in Vocational Training Institutions/ Course and Training Institutions prior to and in preparation for bilateral alignment negotiations. Recommendation 3 proposes establishing a mandatory language proficiency threshold, equivalent to IELTS Academic 5.5 or OET B, as a requirement for certification of Vocational Training Institutions/Courses and Training Institutions for workers intended for the Australian aged care market. This threshold is deliberately set below the benchmark applied in the regulated health professions migration pathway (IELTS 7.0 for nursing) to reflect a realistic proficiency baseline that can be achieved through intensive pre-departure English language preparation, while still establishing a minimum standard that will substantially reduce the language-related competency failures documented in Section 5.2.

Recommendation 4 addresses the practicum deficit identified as a critical structural gap. It proposes the introduction of a mandatory 80-hour supervised practicum conducted in an accredited simulation facility, a hospital aged care ward, or a partner community care organisation as a mandatory component of the Vocational Training Institution/Training Institution curriculum. Course and Training Institutions for the Australian market. The 80-hour threshold is proposed as a realistic initial benchmark, representing a substantial increase from the current norm of zero hours of mandatory practicum while remaining achievable within the resource and infrastructure constraints of the Indonesian training market.

3. R6: Rights-Based Curriculum and Inclusive Practices

Recommendation 6 addresses the normative gap identified the divergence between the rights-based paradigm and inclusive practices embedded in the Australian Aged Care Act 2024 and the ACQS (Aged Care Quality Standards) and the current content of Indonesian pre-departure training in professional ethics. This recommendation proposes the development of a dedicated curriculum module, tentatively titled ‘Rights, Dignity and Inclusive Care in Australian Aged Care Settings’, to be developed jointly by the UNNES–Monash consortium and the ACQSC, and delivered as a mandatory component of the Occupational Training Institute/Training Program. Course and Training Institution aligned with BCAF (Bilateral Curriculum Alignment Framework). The inclusive practice curriculum reform proposed here has implications beyond the preparation of individual workers. It constitutes a pedagogical intervention in the professional identity formation of Indonesian care workers, creating the conditions, following Foucault's (1995) analysis, for a different kind of normalization: one oriented not toward obedience to disciplinary authority, but toward the development of an ethical professional self capable of exercising genuine agency in Australian care settings.

4. R7–R8: AI-Assisted Learning and Quality Incentive Structures

Recommendation 7 proposes the development of an AI-assisted differentiated learning pathway for Indonesian care workers enrolled in the Job Training Institute program / Courses and Training Institutions aligned with BCAF (Bilateral Curriculum Alignment Framework) and post-arrival bridge programs in Australia. Recommendation 8 proposes the creation of a quality incentive structure in the Indonesian training market that rewards Vocational Training Institutions / Courses and Training Institutions that achieve BCAF (Bilateral Curriculum Alignment Framework) alignment benchmarks. As the analysis the commercial logic of the current training market creates incentives for accelerated turnaround over curriculum quality. Reversing this incentive structure requires policy interventions that make curriculum quality financially profitable. The proposed incentive structure would include: preferential P3MI licensing for placement agents sourced exclusively from Job Training Institutions/ BCAF (Bilateral Curriculum Alignment Framework)-accredited Course and Training Institutions; government-supported training subsidies for institutions that achieve and maintain BCAF (Bilateral Curriculum Alignment Framework) accreditation; and a public quality assessment system for Vocational Training Institutions/ The Course and Training Institute is analogous to Australia's Star Ratings for aged care providers, making curriculum quality visible to prospective workers and their families.

5. Implementation Pathway: UNNES–Monash Research Collaboration 2026–2028

The recommendations presented in this section are ambitious in scope and cannot be implemented through unilateral action by any single institutional actor. Their realization requires a coordinated and phased implementation pathway that appropriately sequences bilateral and domestic reforms and progressively builds institutional capacity. The proposed UNNES–Monash University research collaboration for the period 2026–2028 is identified as a critical institutional vehicle for the technical development phase of this implementation pathway which includes three continuous phases that will be conducted in three years simultaneously.

Phase 1 (2026, Year 1) should focus on the technical foundation: systematic documentary mapping of Indonesian National Occupational Competency Standards competency units against CHC33015 units across five clusters; development of a draft BCAF (Bilateral Curriculum Alignment Framework) framework; design of rights-based curriculum modules and inclusive practices; and feasibility assessment of an AI-assisted learning platform. This phase should generate the technical evidence base necessary to initiate formal MRA (Mutual Recognition Arrangement) negotiations under the IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement) framework and to brief MoM (Ministry of Manpower), MoEC (Ministry of Education and Culture**)**, and DFAT (Department of Foreign Affairs and Trade) on the bilateral governance reform agenda.

Phase 2 (2027, Year 2) should focus on piloting and iterative refinement: delivery of the draft BCAF (Bilateral Curriculum Alignment Framework) framework to a pilot group of Vocational Training Institutions/ Course and Training Institute; implementation of rights-based curriculum modules in a pilot

setting; development and alpha testing of an AI-assisted learning platform; and initiation of formal MRA (Mutual Recognition Arrangement) scoping discussions between representatives of the Indonesian and Australian governments.

Phase 3 (2028, Year 3) should focus on scaling, policy adoption, and sustainability: finalisation of the MRA (Mutual Recognition Arrangement**)** instrument for formal government sign-off; full rollout of BCAF (Bilateral Curriculum Alignment Framework) accreditation for Vocational Training Institutions/ Interested Course and Training Institutions; full implementation of an AI-assisted learning platform; establishment of a quality incentive structure; and longitudinal evaluation of placement outcomes for workers trained under the full BCAF (Bilateral Curriculum Alignment Framework*)* framework. The three-year timeline is ambitious but achievable given the existing bilateral institutional relationship between UNNES and Monash University, the policy urgency created by the Aged Care Act 2024 reforms and the Support at Home mandate, and the strong shared interests between Australia's aged care workforce shortage and Indonesia's overseas employment agenda, which create impetus for accelerated bilateral cooperation.

4 Discussion

The findings demonstrate a direct relationship between identified competency gaps and the policy interventions proposed in this study. The absence of a bilateral mechanism for recognizing qualifications justifies the recommendations for a Mutual Recognition Arrangement (R1) and a Bilateral Curriculum Alignment Framework (BCAF) (R2). Language competency gaps support the introduction of standardized English proficiency requirements (R3), while deficiencies in practical training and advanced care competencies justify mandatory supervised practicum reforms (R4). Likewise, the lack of digital literacy and rights-based care content provides a rationale for recommendations R5 and R6. These linkages indicate that the proposed recommendations emerge directly from empirical policy gaps rather than from normative assumptions.

This paper has examined the structural policy gap between the Indonesian informal care workers training framework (Indonesian National Care Workers Competency Standards) and the institutional system of Vocational Training Institutions/Course and Training Institutions (IBs) with the qualification requirements and regulations of the Australian aged care sector, as defined by Training Package CHC33021, Aged Care Quality Standards, and the legislative framework of the Aged Care Act 1997 (as replaced by the Aged Care Act 2024). Through a systematic comparative documentary analysis organised around five competency clusters of language proficiency, core caregiving skills, ethics and inclusive practices, digital literacy, and work readiness, this paper has demonstrated that the approximately 40% failure rate among Indonesian care workers placements in Australian settings is not an anomaly caused by individual worker incompetence, but rather a predictable a liminal gaps in structural system and ongoing curriculum misalignment (Adebayo et al., 2023; Overgaard et al., 2022; Sheehy et al., 2023).

An analysis of the Indonesian policy context reveals a regulatory architecture characterised by multiple ministerial authorities, an institutional base of non-formal education with limited quality assurance, and national competency standards that serve as reference benchmarks rather than prescriptive qualifications, resulting in wide variation in training quality across the Job Training Institution/Course and Training Institution provider market (Eagar et al., 2019). An analysis of the Australian policy context documents a sector undergoing profound regulatory transformation through reforms to the Aged Care Act 2024, the Support at Home program, and the ongoing implementation of Royal Commission recommendations that progressively increase the qualification requirements, digital literacy, and inclusive practices imposed on direct care workers, including internationally recruited care workers. A comparative gap analysis indicates that these two regulatory trajectories are increasingly diverging rather than converging, with Australian requirements moving forward rapidly while the Indonesian curriculum framework has yet to catch up.

The paper's primary theoretical contribution is the application of structural liminality as a policy-analytical category to understand curriculum misalignment in bilateral aged care migration. The concept of liminality has been widely applied in migration studies to describe the subjective experience of existing in-between conditions for workers who are neither fully at home in their country of origin nor fully integrated in their destination country. This paper extends this application by arguing that structural liminality, in the context of Indonesia–Australia care migration, is not simply an experiential phenomenon, but rather a policy-produced condition: it is created by governance architectures that develop in isolation from each other, that impose different standards of normalisation on the same workers, and that do not provide institutional mechanisms for credential translation across bilateral borders.

The curriculum harmonisation policy is an urgent step to change the status of the Indonesian workforce from industrial objects to protected professional subjects. The recommended action strategies are: a). Alignment of Vocational Curriculum Through a Cross-Sectoral Task Force: Establish a task force between the Ministry of Health and the Ministry of Manpower to overcome "sectoral egos" and integrate core Australian units, especially HLTINF006 (infection prevention) and HLTWHS002 (safe work practices), into the Indonesian National Work Competency Standards. b). Adoption of Mandatory Ageing Specialisation Standards: Require the integration of dementia and palliative care units (Group A CHC33021) into the national nursing curriculum and require a minimum of 120 hours of verified fieldwork as a requirement for graduation from vocational training. c). Optimizing IA-CEPA (Indonesia-Australia Comprehensive Economic Partnership Agreement) for Skills Recognition: Utilising the *Indonesia-Australia Comprehensive Economic Partnership Agreement* (IA-CEPA) framework as a formal vehicle for skills *recognition*. The government should encourage the recognition of harmonised local certifications so that workers are no longer categorized as *unskilled*; d). Reconstructing the Labor Diplomacy Paradigm: The Indonesian government must decisively shift its perspective on the WHV (Working Holiday Visa) program from "cultural exchange" to "skilled labor migration" to ensure equal legal protections with Australian domestic workers. These strategic steps will ensure dignified, safe, and competitive labor mobility within an increasingly integrated global healthcare ecosystem.

Despite its contributions, this study has several limitations. First, the analysis relies primarily on documentary and policy sources and does not incorporate empirical data from Indonesian migrant care workers, training providers, employers, or regulators. Consequently, the findings capture structural and regulatory dimensions of curriculum misalignment but cannot fully explain how these gaps are experienced in practice. Second, the comparison focuses exclusively on the Indonesia–Australia aged care corridor and therefore may not be directly generalisable to other migration contexts with different regulatory environments. Future research could employ mixed-methods approaches involving interviews, surveys, and workplace observations to examine how curriculum gaps influence worker experiences, employability, and career trajectories. Comparative studies involving other destination countries in the Asia-Pacific region would also help assess the broader applicability of the Bilateral Curriculum Alignment Framework (BCAF) proposed in this paper.

5 Conclusion

The Indonesia–Australia aged care migration corridor is one of the most consequential bilateral labour mobility arrangements in the contemporary Asia-Pacific. Its success is measured not simply by the number of placements, but by the quality of care provided, the professional dignity of Indonesian workers, and the long-term sustainability of bilateral cooperation, which depends on the curriculum and governance infrastructure that the current policy architecture fails to provide. The extent of the failure is not simply a statistical detail; it represents the thousands of workers who bear the personal, financial, and professional costs of structural governance failures and the thousands of aged care recipients whose care is compromised by those failures.

The policy reforms proposed in this paper—bilateral curriculum alignment, mutual recognition, mandatory language standards and practicums, digital literacy integration, rights-based professional development, and AI-assisted differentiated learning—are ambitious but not utopian. These reforms are based on existing precedents in the bilateral policy architecture, established institutional relationships, and a growing body of empirical evidence that makes the costs of inaction clear. The question is not whether these reforms are possible, but whether the political will and institutional investment necessary to implement them can be mobilised before the next cohort of Indonesian care workers and Australian aged care recipients suffer the price of continued misalignment. This paper argues that this can, and must, happen. The Indonesia–Australia care migration corridor has the potential to be a transformative model for bilateral curriculum policy: one that not only addresses labor supply issues but also advances the goals of inclusive migrant education, professional dignity, and sustainable development that both countries have committed to in international fora. Realising this potential requires treating curriculum alignment not as a technical afterthought for labor market management, but as a fundamental governance investment on which the entire bilateral care workforce system depends.

Declarations

Clinical trial number

not applicable.

Ethics, Consent to Participate, and Consent to Publish declarations:

not applicable.

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Author Contribution

All authors contributed to the study conception and design. Material preparation, data collection, and analysis were performed by the authors collaboratively. The first draft of the manuscript was written by the lead author, and all authors commented on previous versions of the manuscript. All authors read and approved the final manuscript.

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Data Availability

All data supporting the findings are publicly available regulatory, curriculum, and policy documents. The primary documents analysed are: (Indonesian context) the Indonesian National Work Competency Standards (SKKNI) for Elderly Caregivers, Kepmenaker No. 28/2021; Presidential Regulation (Perpres) No. 8/2012 on the Indonesian National Qualifications Framework; Permenaker No. 17/2016 on Licensing and Registration Procedures for Job Training Institutions; and Permendikbud No. 81/2013 on the Establishment of Non-Formal Education Units; (Australian context) Training Package CHC33021 (Certificate III in Individual Support); the Aged Care Quality Standards; the Aged Care Act 1997, as replaced by the Aged Care Act 2024; and the Final Report of the Royal Commission into Aged Care

Quality and Safety (2021). Full bibliographic details and the public URLs for all of these documents are provided in the Reference List. No restrictions apply to their availability.

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